

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

KELLY BLAND, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

DIGITAL INSURANCE LLC d/b/a One
Digital,

Defendant.

Case No.: 7:25-cv-00050-O

Hon. Reed C. O'Connor

UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

Defendant Digital Insurance LLC moves, unopposed, to extend its time to answer or otherwise respond to Plaintiff's complaint by 30 days (through July 14, 2025).

1. Defendant's current deadline to respond to the Complaint is June 12, 2025. *See* ECF No. 5.

2. The undersigned counsel has only been recently retained to represent Defendant and is in the process of diligently evaluating and investigating Plaintiff's claims and preparing Defendant's response. Defendant requests a 30-day extension, until July 14, 2025, to respond to the Complaint. This extension will provide sufficient time to gather necessary documents, investigate Plaintiff's claims, and complete Defendant's response.

3. A Court may grant a request to extend time for good cause. Fed. R. Civ. P. 6(b)(1)(A). Good cause exists here for the reasons mentioned above. This request is not being made for the purpose of delay. The request is for a reasonable, modest extension and will not affect any other deadlines in this case.

4. On June 3, 2025, counsel for Defendant conferred with Plaintiff's counsel, who consents to this request in full.

Defendant thus asks the Court to grant this motion and extend its deadline through July 14, 2025.

Dated: June 9, 2025

Respectfully submitted,

By: /s/ Theodore Kwong
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Counsel for Defendant

CERTIFICATE OF CONFERRAL

I certify that I conferred with Plaintiff's counsel about an extension through July 14, 2025, and that Plaintiff consents to the requested relief.

/s/ Matthew A. Keilson
Matthew A. Keilson

CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2025, I caused a true and correct copy of the foregoing to be filed with the Clerk of Court using the CM/ECF system, which will send notice of the electronic filing to all counsel of record.

/s/ Theodore Kwong
Theodore Kwong